



**INTERROGATORY NO. 7:** Identify all witnesses who provided statements to representatives of Nabors Corporate Services, Inc., Nabors Completion and Production Services Company, and/or C&J Well Services, Inc. during 2012 concerning investigations of allegations of race discrimination concerning employees of Nabors Completion and Production Services Company assigned to Pleasanton, Texas, including the claimants identified in the EEOC's Third Amended Complaint and Duane Jewell.

**ANSWER:** Defendants object to this Interrogatory to the extent that it requires Defendants to marshal all of their available proof or the proof they intend to offer at trial. Defendants further object to this Interrogatory on the grounds that it seeks information shielded from disclosure by the attorney-client and attorney work product privileges. Defendants object to this Interrogatory on the grounds that it is overbroad. Defendants also object to this Interrogatory on the grounds that it seeks to invade the privacy rights of individuals who are not parties to this lawsuit. Defendants further object to this Interrogatory as duplicative of the information sought by Interrogatory No. 6.

Subject to and without waiving the foregoing objection(s), no individuals provided written statements beyond their oral representations made while being interviewed during investigations.

**INTERROGATORY NO. 8:** Identify the dates when Nabors Corporate Services, Inc., Nabors Completion and Production Services Company and C&J Well Services, Inc. first initiated litigation holds as to its employees and agents concerning the claims of discrimination and retaliation made by employees of Nabors Completion and Production Services Company assigned to Pleasanton, Texas during 2012 which are the basis of the above styled lawsuit.

**ANSWER:** Defendants object to this Interrogatory on the grounds that it seeks information shielded from disclosure by the attorney-client and attorney work product privileges.

Subject to and without waiving the foregoing objection(s), Defendants will supplement.

**INTERROGATORY NO. 9:** Identify all officers, employees or agents of Nabors Corporate Services, Inc., Nabors Completion and Production Services Company and/or C&J Well Services, Inc. who were briefed by Julia Wright as to findings and recommended actions to be taken based on investigations of race discrimination or retaliation against personnel assigned to operations of Nabors Completion and Production Services Company in Pleasanton, Texas during 2012.

**ANSWER:** Defendants object to this Interrogatory to the extent that it requires Defendants to marshal all of their available proof or the proof they intend to offer at trial. Defendants further object to this Interrogatory on the grounds that it seeks information shielded from disclosure by the attorney-client and attorney work product privileges. Defendants object to this Interrogatory on the grounds that it is overbroad and harassing, and that it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. Defendants also object to this Interrogatory on the grounds that it seeks to invade the privacy rights of individuals who are not parties to this lawsuit.

**ATTORNEYS FOR DEFENDANTS  
NABORS CORPORATE SERVICES, INC.  
AND C&J WELL SERVICES, INC.**

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**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of foregoing document has been forwarded via email, on this the 27th day of July, 2017 to:

P. David Lopez  
Gwendolyn Young Reams  
Robert A. Canino  
Edward Juarez  
David C. Rivela  
Equal Employment Opportunity Commission  
Dallas District Office,  
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**Via Email**

/s/ James M. Cleary, Jr.  
James M. Cleary, Jr.

David K. Scelto  
Notary Public, State of Texas